

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: August 18, 2004 / 1152

Site Contact(s): Dyan Foss
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Regulatory Contact: Harlen Ainscough
Phone: 303-692-3337

Agency: CDPHE

Purpose of Contact: Clarification of RCRA Unit Closure for Unit 40.27, Acid Etch Process Waste Tank T-1, and 40.28, Acid Etch Process Waste Tank T-2, in Building 883

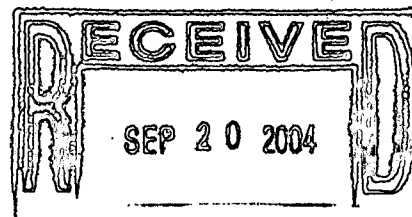
Discussion

The subject tanks are RCRA interim status units. RCRA stable status for these tanks was approved by CDPHE on August 23, 1999. The RCRA closure requirements were included with the notification to invoke the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities received by CDPHE on April 18, 2002 and approved by CDHPE on April 30, 2002 with four conditions:

- The activities do not include the valve vault outside B883,
- Verification sampling and analysis of the remaining concrete is required unless it can be demonstrated the secondary containment's impermeable coating was maintained in good condition during the life of the unit,
- Perform an evaluation of the potential pathways for migration of contamination to determine if soil sampling is necessary, and
- Adherence to the work control process outlined in the RSOP.

The tanks were removed from the pit on August 12, 2004 and will be disposition as low level mixed waste. When the tanks were removed, a fiberglass liner could be seen lining the pit. Since the pit is lined, it is proposed that the closure requirements be slightly modified as follows:

- The fiberglass liner will be removed from the pit and dispositioned as low level mixed waste
- The concrete under the liner will be inspected and surveyed.
- If there is visible staining and/or there is radiological contamination, the concrete will be dry scabbled (Clean Closure Option #3 in the RSOP) or removed and dispositioned as low level mixed waste (closure through removal).
- If there is no visible staining and no radiological contamination, the concrete will be rinsed, and the rinsate analyzed – Clean Closure Option #2 in the RSOP.
- The closure activities will be documented in the B883 Pre-Demolition Survey Report.



This approach was discussed with the CDPHE RCRA point of contact, and he agreed with the approach. This contact record does not include the valve vault outside B883. The soil under the pit will be evaluated for potential migration of contamination. The work control process in the RSOP will be used for planning these activities.

Contact Record Prepared By: Dyan Foss

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